

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CASE NO. 5:23-cv-00205-KDB-DCK

UH Carolina Realty Holdings LLC, et al.)

Plaintiff(s),)

v.)

Appalachian/Brian Estates, Inc., et al.)

Defendant(s).)

DISCLOSURE BY PARTY OR INTERVENOR
IN A DIVERSITY CASE

This disclosure must be filed on behalf of each party or intervenor to an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a). Counsel has a continuing duty to update this information. An executed form should be electronically filed. The disclosing party must file this disclosure at the time of the party's first appearance, pleading, petition, motion, response, or other request addressed to the Court. The disclosing party also must serve this form on the other parties to the action.

All Defendants

who are Defendants

(Name of Party)

(Plaintiff / Defendant / Movant / Intervenor)

make the following disclosures:

1. Is the party identified above an individual?

 YES

 X NO

If the answer is "YES," identify the State citizenship of that individual:

If the answer is "NO," proceed to question No. 2 below.

2. Identify the name and State citizenship of every individual or entity whose citizenship is attributable¹ to the party identified above:

Name of Individual/Entity	Citizenship
<u>Appalachian/Brian Estates, Inc.</u>	<u>NC</u>
<u>Universal Properties/Greensboro, LLC</u>	<u>FL and NC</u>
<u>Universal Properties/Brunswick, LLC</u>	<u>FL and NC</u>
<u>Universal Properties/Conover, LLC</u>	<u>FL and NC</u>
<u>Universal Properties/Concord LLC</u>	<u>FL and NC</u>
<u>Universal Properties/Hendersonville, LLC</u>	<u>FL and NC</u>
<u>Universal Properties/Wake, LLC</u>	<u>FL and NC</u>
<u>Universal Properties/Greenville, LLC</u>	<u>FL and NC</u>

* See attached for remaining Defendants.

s/ John Michael Durnovich
Signature of Attorney

1/26/2024
Date

¹ “For purposes of diversity jurisdiction, the citizenship of a limited liability company . . . is determined by the citizenship of all of its members.” Cent. W. Va. Energy Co., Inc. v. Mountain State Carbon, LLC, 636 F.3d 101, 103 (4th Cir. 2011). When members are LLCs themselves, the citizenship issues must be traced through until one reaches only individuals and/or corporations. See Jennings v. HCR ManorCare, Inc., 901 F.Supp.2d 649, 651 (D.S.C. 2012) (“an LLC’s members’ citizenship must be traced through however many layers of members there may be”).

2. Identify the name and State citizenship of every individual or entity whose citizenship is attributable to the party identified above (continued):

Name of Individual/Entity:	Citizenship:
Universal Properties/King, LLC	FL and NC
Universal Properties/Lenoir, LLC	FL and NC
Universal Properties/Lillington, LLC	FL and NC
Universal Properties/Raleigh, LLC	FL and NC
Universal Properties/North Raleigh, LLC	FL and NC
Universal Properties/Oxford, LLC	FL and NC
Universal Properties/Ramseur, LLC	FL and NC
Universal Properties/Charlotte, LLC	FL and NC
Universal Properties/Columbia, LLC	FL and NC
Choice Health Management Services, LLC	FL and NC
Community Sundries, LLC	FL and NC
Universal Health Care/Blumenthal, Inc.	NC
Universal Health Care/Brunswick, Inc.	NC
Catawba Valley Living, LLC	FL and NC
Universal Health Care/Concord, Inc.	NC
Universal Health Care/Fletcher, Inc.	NC
Universal Health Care/Fuquay-Varina, Inc.	NC
Universal Health Care/Greenville, Inc.	NC
Universal Health Care/King, Inc.	NC
Universal Health Care/Lenoir, Inc.	NC
Universal Health Care/Lillington, Inc.	NC
Universal Health Care/Raleigh, Inc.	NC
Universal Health Care/North Raleigh, Inc.	NC
Universal Health Care/Oxford, Inc.	NC
Universal Health Care/Ramseur, Inc.	NC
Saturn Health, Inc.	NC
Brian Center/St. Andrews, LLC	FL and NC
Universal Health Care, Inc.	NC

CERTIFICATE OF SERVICE

I certify that I have electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel and parties of record.

This the 26th day of January, 2024.

/s/ John Michael Durnovich
John Michael ("J.M.") Durnovich